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FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

FEB 14 1 05 PM '00

February 9, 2000

RE: Violations of Federal Election Campaign Act by Darrell Issa and Issa for Congress,  
California 48

Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

MUR 4972

Dear Commissioners:

Darrell Issa and his congressional campaign committee in California 48 are violating federal election laws by providing illegal contributions to Bill Horn for U.S. Senate, and by either failing to report expenditures by the campaign or by accepting illegal contributions. Issa and his campaign are violating the Federal Election Campaign Act and depriving the district's voters of the information the law requires them to have in order to make an informed choice in the March 7 primary.

Therefore, this complaint is filed with the Federal Election Commission under 2 USC section 437g(a) so that Issa and his campaign are made to abide by the contribution limits and disclosure requirements of the federal election laws. As the primary is less than one month away, and in light of the serious nature of these charges, the Commission must act promptly to ensure that this campaign is run fairly and according to the law.

**Violations:**

The Issa campaign, which filed their annual disclosure report on January 31, 2000, shows no disclosures for the following:

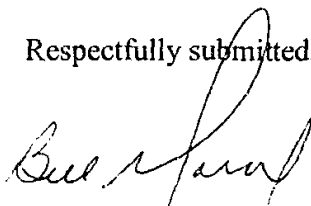
- Staff salaries: Despite the fact that Jason Miller, a paid political consultant, and Andy Gharakhani, also a paid political operative, have worked actively on the Issa campaign since November, 1999, the Issa disclosure reports no payment to them for their professional services.
- Donations to Bill Horn for U.S. Senate: Darrell Issa has provided secret, and illegal, donations to the Bill Horn for U.S. Senate campaign. Issa has previously donated the maximum legal donation to the Horn campaign, and has willfully skirted the law by providing secret donations to the same campaign. These donations have been funneled to Scott Taylor, a professional political consultant, for services to the Horn campaign.

**Conclusion:**

Upon information and belief, Darrell Issa and the Issa for Congress Committee have violated the Act and the Commission's regulations by providing illegal contributions to Bill Horn for U.S. Senate, and by either failing to report expenditures by the campaign or by accepting illegal contributions.


Since the primary is less than a month away, the Commission must act promptly to correct this impermissible subsidization of a U.S. House race and a U.S. Senate race. In addition, the Commission must act to prevent this cover-up of expenditures so that the voters of California's 48<sup>th</sup> congressional district may have the full information to which they are entitled in deciding for whom to vote.

Respectfully submitted,



Bill Morrow

SUBSCRIBED AND SWORN TO BEFORE me this 9<sup>th</sup> day of February 2000.

  
Notary Public

My Commission Expires:  
4-30-2001.

